

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR MANAGEMENT**

**National Composites, Inc.
2629 Foundation Drive
South Bend, Indiana 46628**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F141-5531-00085	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(b)]	4
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	4
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	4
A.4	FESOP Permit Applicability [326 IAC 2-8-2]	5
SECTION B	GENERAL CONDITIONS	6
B.1	Permit No Defense [326 IAC 2-1-10] [IC 13]	6
B.2	Definitions [326 IAC 2-8-1]	6
B.3	Permit Term [326 IAC 2-8-4(2)]	6
B.4	Enforceability [326 IAC 2-8-6]	6
B.5	Termination of Right to Operate [326 IAC 2-8-3 (h)][326 IAC 2-8-9]	6
B.6	Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]	6
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	6
B.8	Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]	6
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	7
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	7
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]	7
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	7
B.13	Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)] [326 IAC 1-6-3]	8
B.14	Emergency Provisions [326 IAC 2-8-12]	9
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	11
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination	11
B.17	Permit Renewal [326 IAC 2-8-3(h)]	12
B.18	Administrative Permit Amendment [326 IAC 2-8-10]	13
B.19	Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]	13
B.20	Significant Permit Modification [326 IAC 2-8-11(d)]	13
B.21	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)]	13
B.22	Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]	14
B.23	Operational Flexibility [326 IAC 2-8-15]	14
B.24	Construction Permit Requirement [326 IAC 2]	15
B.25	Inspection and Entry [326 IAC 2-8-5(a)(2)]	15
B.26	Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]	16
B.27	Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	16
B.28	Enhanced New Source Review [326 IAC 2]	16
SECTION C	SOURCE OPERATION CONDITIONS	17
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Overall Source Limit [326 IAC 2-8]	17
C.2	Opacity [326 IAC 5-1]	17
C.3	Open Burning [326 IAC 4-1][IC 13-17-9]	17
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	17
C.5	Fugitive Dust Emissions [326 IAC 6-4]	18
C.6	Operation of Equipment [326 IAC 2-8-5(a)(4)]	18
C.7	Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]	18
	Testing Requirements [326 IAC 2-8-4(3)]	
C.8	Performance Testing [326 IAC 3-6]	18
	Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	
C.9	Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]	19

C.10	Monitoring Methods [326 IAC 3]	19
C.11	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]	19
Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]		
C.12	Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]	20
C.13	Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]	20
C.14	Actions Related to Noncompliance Demonstrated by a Stack Test	21
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]		
C.15	Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]	22
C.16	Monitoring Data Availability	22
C.17	General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]	23
C.18	General Reporting Requirements [326 IAC 2-8-4(3)(C)]	24
Stratospheric Ozone Protection		
C.19	Compliance with 40 CFR 82 and 326 IAC 22-1	25
SECTION D.1 FACILITY OPERATION CONDITIONS		
Two (2) bag dumping stations (ID#s EU-01a and EU-01b)		26
Emission Limitations and Standards [326 IAC 2-8-4(1)]		
D.1.1	Particulate Matter (PM) [326 IAC 6-3]	26
Compliance Determination Requirements		
D.1.2	Testing Requirements [326 IAC 2-8-5(1)]	26
Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]		
D.1.3	Preventive Maintenance Plan [326 IAC 2-8-4(9)]	26
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]		
D.1.4	Record Keeping and Reporting Requirements	26
SECTION D.2 FACILITY OPERATION CONDITIONS		
Two (2) extruders (ID# EU-02) and four (4) mold presses (ID# EU-03)		27
Emission Limitations and Standards [326 IAC 2-8-4(1)]		
D.2.1	Particulate Matter (PM) [326 IAC 6-3]	27
D.2.2	Hazardous Air Pollutants (HAPs)	27
Compliance Determination Requirements		
D.2.3	Testing Requirements [326 IAC 2-8-5(1)]	27
Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]		
D.2.4	Preventive Maintenance Plan [326 IAC 2-8-4(9)]	27
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]		
D.2.5	Record Keeping Requirements	28
D.2.6	Quarterly Reporting Requirements	28
FESOP Quarterly Report Form		29
FESOP Certification Form		30
Emergency/Deviation Occurrence Report Form		31 - 32
Quarterly Compliance Report Form		33

SECTION A SOURCE SUMMARY

This permit is based on information presented in the permit application and any information requested by and submitted to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Saint Joseph County Health Department.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a reinforced plastic products manufacturing plant.

Responsible Official: William O. Fitzgibbons
Source Address: 2629 Foundation Drive, South Bend, Indiana 46628
Mailing Address: 2629 Foundation Drive, South Bend, Indiana 46628
SIC Code: 2821
County Location: Saint Joseph
County Status: Attainment for PM-10, SO₂, and CO
Attainment for Ozone
Nonattainment for TSP (East of Pine Road and North of Kern Road)

Source Status: Federally Enforceable State Operating Permit
Minor Source, under PSD and Emission Offset Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

The stationary source consists of the following emission units and pollution control devices:

(a) Bag Dumping Stations

one (1) CaCO₃ bag dumping station (ID# EU-01a) with a maximum dumping capacity of 1.0 ton per hour. Station EU-01a is attached to dust collector D1 and exhausts through stack D1.

one (1) Crystic bag dumping station (ID# EU-01b) with a maximum dumping capacity of 0.1 ton per hour. Station EU-01b is attached to dust collector D2 and exhausts through stack D2.

(b) two (2) extruders (ID# EU-02) used for sheet molding, with a maximum total capacity of 2.25 tons per hour and exhausts through general ventilation GV1; and

(c) four (4) mold presses (ID# EU-03) used for molding plastic composite parts, with a maximum total capacity of 0.08 tons per hour and exhausts through general ventilation GV1.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) ten (10) natural gas-fired combustion units (ID#'s H1-H10) with heat input less than ten million (10,000,000) Btu per hour;

(b) one (1) zinc stearate dumping operation with a capacity of 45 pounds per hour;

(c) one (1) laboratory as defined in 326 IAC 2-7-1(20);

(d) one (1) paved parking area;

- (e) mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Centigrade;
- (f) routine maintenance activities;
- (g) equipment used to collect any material that might be release during malfunction, process upset, or spill clean-up;
- (h) one (1) electric hot box (curing oven) (ID# EHB-1) used for driving off all remaining VOCs from waste and scrapped molding compound, with a maximum capacity of 100 pounds of low pressure molding compound per hour;
- (i) two (2) 5,000 gallon above ground storage tanks (ID# ST1 and ST2) for polyester resin;
- (j) one (1) 5,000 gallon above ground storage tank (ID# ST3) for low profile additive (LPA);
and
- (k) one (1) 2,570 gallon above ground storage tank (ID# ST4) for styrene monomer.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, OAM, and Saint Joseph County Health Department.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Saint Joseph County Health Department.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Saint Joseph County Health Department
County City Building, Room 914
South Bend, Indiana 46601-1870

- (b) The Permittee shall furnish to IDEM, OAM, and Saint Joseph County Health Department within a reasonable time, any information that IDEM, OAM, and Saint Joseph County Health Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and Saint Joseph County Health Department copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to the U.S. EPA and IDEM, OAM, and Saint Joseph County Health Department along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM, and Saint Joseph County Health Department may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and

shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Saint Joseph County Health Department
County City Building, Room 914
South Bend, Indiana 46601-1870

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Saint Joseph County Health Department on or before the date it is due. [326 IAC 2-5-3]
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as IDEM, OAM, and Saint Joseph County Health Department may require to determine the compliance status of the source, as specified in Section D of this permit.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.13 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) Preventive Maintenance Plans shall be submitted to IDEM, OAM, and Saint Joseph County Health Department, upon request and shall be subject to review and approval by IDEM, OAM, and Saint Joseph County Health Department..

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements of this permit;
 - (4) For each emergency lasting longer than one (1) hour, the Permittee notified IDEM, OAM, and Saint Joseph County Health Department, within four (4) daytime business hours by telephone or facsimile after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967, and
Telephone No.: 219-235-9775 (Saint Joseph County Health Department)
Facsimile No.: 317-235-7558.

Failure to notify IDEM, OAM, and Saint Joseph County Health Department, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting longer than one (1) hour, the Permittee submitted written notice or facsimile of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

and

Saint Joseph County Health Department
County City Building, Room 914
South Bend, Indiana 46601-1870

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes any emergency or upset provision contained in 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, and Saint Joseph County Health Department, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, and Saint Joseph County Health Department, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the

emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in 326 IAC 2-8-12(g)(2)(B).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Saint Joseph County Health Department
County City Building, Room 914
South Bend, Indiana 46601-1870

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and Saint Joseph County Health Department determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAM, and Saint Joseph County Health Department, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, and Saint Joseph County Health Department, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and Saint Joseph County Health Department, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and Saint Joseph County Health Department and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Saint Joseph County Health Department
County City Building, Room 914
South Bend, Indiana 46601-1870

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Saint Joseph County Health Department, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, and Saint Joseph County Health Department upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM, and Saint Joseph County Health Department takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, and Saint Joseph County Health Department, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM, and Saint Joseph County Health Department, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished under administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b), except as provided by 326 IAC 2-8-11(c).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, and Saint Joseph County Health Department takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making

changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.

- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, review by affected states, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Saint Joseph County Health Department
County City Building, Room 914
South Bend, Indiana 46601-1870

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, and Saint Joseph County Health Department, in the notices specified in 326 IAC 2-8-15(b)(1), (c)(1), and (d).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable State Implementation Plan (SIP) provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.24 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be

required by law, the Permittee shall allow IDEM, OAM, and Saint Joseph County Health Department, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, and Saint Joseph County Health Department, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10.
- (c) IDEM, OAM, and Saint Joseph County Health Department shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

B.28 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as

provided in 326 IAC 4-2 and in 326 IAC 9-1-2(3).

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

**C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]
[40 CFR 61, Subpart M]**

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be accredited is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Saint Joseph County Health Department
County City Building, Room 914
South Bend, Indiana 46601-1870

no later than thirty-five (35) days before the intended test date.[326 IAC 3-6]

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required in this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If

due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Saint Joseph County Health Department
County City Building, Room 914
South Bend, Indiana 46601-1870

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator if the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification regardless if asbestos is present.
- (b) Written notification is to be sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) asbestos removal or demolition start date;
 - (B) removal or demolition contractor; or
 - (3) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Saint Joseph County Health Department
County City Building, Room 914
South Bend, Indiana 46601-1870

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, and Saint Joseph County Health Department that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and Saint Joseph County Health Department that the Risk Management Plan is being properly implemented.

C.13 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that

reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and Saint Joseph County Health Department upon request and shall be subject to review and approval by IDEM, OAM, and Saint Joseph County Health Department. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the compliance related information was

not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

Record Keeping and Reporting [326 IAC 2-8-4(3)]

C.15 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Saint Joseph County Health Department
County City Building, Room 914
South Bend, Indiana 46601-1870
- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Saint Joseph County Health Department on or before the date it is due.

C.16 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing all observations, sampling, maintenance procedures, and record

keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM, OAM, and Saint Joseph County Health Department may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM, and Saint Joseph County Health Department representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;

- (3) All calibration and maintenance records;
- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Saint Joseph County Health Department
County City Building, Room 914
South Bend, Indiana 46601-1870
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Saint Joseph County Health Department on or before the date it is due. [326 IAC 2-5-3]
- (d) Unless otherwise specified in this permit any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

one (1) CaCO₃ bag dumping station (ID# EU-01a) with a maximum dumping capacity of 1.0 ton per hour. Station EU-01a is attached to dust collector D1 and exhausts through stack D1.

one (1) Crystic bag dumping station (ID# EU-01b) with a maximum dumping capacity of 0.1 ton per hour. Station EU-01b is attached to dust collector D2 and exhausts through stack D2.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter

That pursuant to 326 IAC 6-3 (PM Limitations for Process Operations), the particulate matter emissions from the CaCO₃ and Crystic bag dumping stations shall not exceed 4.0 and 1.1 pounds per hour, respectively.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of the CaCO₃ and Crystic bag dumping stations is not required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on these facilities under 326 IAC 2-8-4 and 326 IAC 2-8-5.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

That a Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the CaCO₃ bag dumping station.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [26 IAC 2-8-16]

D.1.4 There are no record keeping and reporting requirements for the CaCO₃ and Crystic bag dumping stations.

SECTION D.2 FACILITY OPERATION CONDITIONS

- (a) two (2) extruders (ID# EU-02) used for sheet molding, with a maximum total capacity of 2.25 tons per hour and exhausts through general ventilation GV1.
- (b) four (4) mold presses (ID# EU-03) used for molding plastic composite parts, with a maximum total capacity of 0.08 tons per hour and exhausts through general ventilation GV1.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter

That pursuant to 326 IAC 6-3 (PM Limitations for Process Operations), the particulate matter emissions shall not exceed the following:

Operation	326 IAC 6-3-2 limit (lbs/hr)
extrusion (EU-02)	7.1
molding/pressing (EU-03)	0.7

D.2.2 Hazardous Air Pollutants (HAPs)

- (a) That the HAP material usage for the extrusion and molding/pressing operations shall be limited such that the total single HAP emissions from these facilities shall not exceed 7.8 tons per 12 consecutive month period rolled on a monthly basis. The monthly HAP emissions shall be determined using the following equation:

Single HAP emissions (tons/month) = single HAP usage for extrusion (tons/month) * 0.02 + single HAP usage for molding/pressing (tons/month) * 0.03

Therefore, the requirements of 326 IAC 2-7 (Part 70 Rules) do not apply. Since single HAP emissions are equivalent to VOC emissions for these types of operations, compliance with the HAP limits shall also render 326 IAC 8-1-6 not applicable.

- (b) Any change or modification which may result in potential emissions of any combination of HAPs greater than 24 tons per year from these facilities shall need prior approval from IDEM, OAM, and shall be subject to 326 IAC 2-7 (Part 70 Rules).

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of the extrusion and molding/pressing operations is not required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on these facilities under 326 IAC 2-8-4 and 326 IAC 2-8-5.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

That a Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the extrusion and molding/pressing operations.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [26 IAC 2-8-16]

D.2.5 Record Keeping Requirements

That the Permittee shall maintain at the source complete and sufficient records to establish compliance with the HAP limit established in condition D.2.2. The records shall contain a minimum of the following:

- (a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- (b) The density (pounds per gallon) of the HAP containing material;
- (c) The HAP content (weight percent) of each material used; and
- (d) The weight of HAP emitted for each compliance period.

D.2.6 Quarterly Reporting Requirements

That a quarterly summary to document compliance with operation conditions D.2.2 shall be submitted, using the enclosed forms or their equivalent, within thirty (30) days after the end of the reporting period.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: National Composites, Inc.
Source Address: 2629 Foundation Drive, South Bend, Indiana 46628
FESOP No.: F141-5531-00085
Facility: two (2) extruders (ID# EU-02) and four (4) mold presses (ID# EU-03)
Parameter: HAP emissions
Limit: single HAP = 7.2 tons per 12 consecutive month period rolled on a monthly basis
Equation: $\text{Single HAP emissions (tons/month)} = \text{single HAP usage for extrusion (tons/month)} * 0.02 + \text{single HAP usage for molding/pressing (tons/month)} * 0.03$

Year: _____

Month	Usage of worst case HAP this month for extrusion (tons)	Usage of worst case HAP this month for molding/pressing (tons)	Total of worst case HAP emissions this month (tons)	Total of worst case HAP emissions for previous 12 months (tons)
Month 1 (Month)				
Month 2 (Month)				
Month 3 (Month)				

- ☐ No deviation occurred in this month.
- ☐ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

State Form 47738 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
SAINT JOSEPH COUNTY HEALTH DEPARTMENT

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: National Composites, Inc.
Source Address: 2629 Foundation Drive, South Bend, Indiana 46628
Mailing Address: 2629 Foundation Drive, South Bend, Indiana 46628
FESOP No.: F141-5531-00085

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Emergency/Deviation Occurrence Reporting Form
- ☐ Test Result (specify) _____
- ☐ Report (specify) _____
- ☐ Notification (specify) _____
- ☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

State Form 47741 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

and

SAINT JOSEPH COUNTY HEALTH DEPARTMENT

**County City Building, Room 914
South Bend, Indiana 46601-1870
Phone: 219-235-9775
FAX: 317-235-7558**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: National Composites, Inc.
Source Address: 2629 Foundation Drive, South Bend, Indiana 46628
Mailing Address: 2629 Foundation Drive, South Bend, Indiana 46628
FESOP No.: F141-5531-00085

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
<input type="checkbox"/> 1.	This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">•The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and•The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input type="checkbox"/> 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <ul style="list-style-type: none">•The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
SAINT JOSEPH COUNTY HEALTH DEPARTMENT**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE REPORT**

Source Name: National Composites, Inc.
Source Address: 2629 Foundation Drive, South Bend, Indiana 46628
Mailing Address: 2629 Foundation Drive, South Bend, Indiana 46628
FESOP No.: F141-5531-00085

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (e.g., Permit Condition D.2.2)	Number of Deviations	Date of each Deviation	No Deviations

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management**

**Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)**

Source Background And Description

Source Name:	National Composites, Inc.
Source Location:	2629 Foundation Drive, South Bend, IN 46628
County:	Saint Joseph
Operation Permit No.:	F141-5531-00085
Permit Reviewer:	Marco A. Salenda

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from National Composites, Inc. relating to the operation of a reinforced plastic products manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

The source does not have any permitted emission units and pollution control devices.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

- (1) two (2) bag dumping stations (ID#s EU-01a and EU-01b), each with a maximum dumping capacity of 1.0 and 0.1 tons per hour, respectively;
- (2) two (2) extruders (ID# EU-02) used for sheet molding, with a maximum total capacity of 2.25 tons per hour; and
- (3) four (4) mold presses (ID# EU-03) used for molding plastic composite parts, with a maximum total capacity of 0.08 tons per hour.

Insignificant Activities

The source also includes the following insignificant activities:

- (1) ten (10) natural gas-fired combustion units (ID#'s H1-H10) with heat input less than ten million (10,000,000) Btu per hour;
- (2) one (1) zinc stearate dumping operation with a capacity of 45 pounds per hour;
- (3) one (1) laboratory as defined in 326 IAC 2-7-1(20);
- (4) one (1) paved parking area;
- (5) mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Centigrade;

- (6) routine maintenance activities;
- (7) equipment used to collect any material that might be release during malfunction, process upset, or spill clean-up;
- (8) one (1) electric hot box (curing oven) (ID# EHB-1) used for driving off all remaining VOCs from waste and scrapped molding compound, with a maximum capacity of 100 pounds of low pressure molding compound per hour;
- (9) two (2) 5,000 gallon above ground storage tanks (ID# ST1 and ST2) for polyester resin;
- (10) one (1) 5,000 gallon above ground storage tank (ID# ST3) for low profile additive (LPA); and
- (11) one (1) 2,570 gallon above ground storage tank (ID# ST4) for styrene monomer.

Enforcement Issue

- (1) IDEM is aware that the entire source has been constructed and operated prior to receipt of the proper permit.
- (2) IDEM is reviewing this matter and will take appropriate action. This proposed FESOP will also satisfy the requirements of the construction permit rules.
- (3) There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on March 18, 1996.

During the technical review process it was determined that NCI's bag dumping stations are out of compliance with 326 IAC 6-3-2 (PM Limitations for Process Operations). Due to this circumstance a FESOP was not able to be issued by the December 13, 1996 deadline. A Part 70 permit conversion kit was received on December 16, 1996 from NCI with the intent of still receiving a FESOP.

On February 4, 1997, a more detailed description of NCI's bag dumping stations was received. After further review, it was determined that the stations are attached with separate dust collectors which control particulate matter emissions. Therefore, the bag dumping stations are able to comply with 326 IAC 6-3-2.

Emissions Calculations

See Appendix A: Emission Calculations for detailed calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	PTE (tons/year)
PM	26.9
PM-10	26.9
VOC	75.4

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

See attached spreadsheets for detailed calculations (pages 1 and 4 of Appendix A).

HAP	PTE (tons/year)
Styrene (worst case single HAP)	58.1
TOTAL HAPs	75.4

See attached spreadsheets for detailed calculations (page 3 of Appendix A).

- (1) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (2) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

Limited Potential To Emit

The source has accepted the following federally enforceable limitations:

- (1) To simplify record keeping and to accommodate unpredictable variations in production, the source has accepted federally enforceable production limitations that limit potential to emit VOC emissions from the extrusion operation to 22.0 tons per 12 consecutive month period rolled on a monthly basis. This limit was established at 11/12ths of 24 tons per year to eliminate the effect that daily variations would have on any 365 day period. Therefore, 326 IAC 8-1-6 does not apply.
- (2) The source has accepted a limit on potential to emit of 7.2 tons per 12 consecutive month period for any single HAP and 19 tons per 12 consecutive month period for any combination of HAPs for significant activities only (i.e., extrusion and molding/pressing operations). These limits were established at 11/12ths of 9.4 tons per year excluding insignificant activities (1.6 tons per year) for any single HAP and 11/12ths of 24 tons per year excluding insignificant activities (3.0 tons per year) for any combination of HAPs. These eliminate the effect that daily variations would have on any 365 day period.
- (3) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

	Limited PTE (tons/yr)		
Process/ facility	VOC	Single HAP	Total HAPs
bag dumping (EU-01)	0.0	0.0	0.0
extrusion (EU-02)	22	7.2	19
molding/pressing (EU-03)	3.4		
insignificant activities	3.2	1.6	3.0
Total Emissions	29	8.8	22

Attached Table (1) summarizes the permit conditions and requirements.

County Attainment Status

The source is located in Saint Joseph County.

Pollutant	Status
TSP	secondary nonattainment *
PM-10	attainment
SO ₂	attainment
Ozone	maintenance nonattainment
CO	attainment
Lead	attainment

* TSP status for Saint Joseph County (parts only) is secondary nonattainment pending U.S. EPA approval of redesignation to attainment on June 16, 1997.

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12, 40 CFR 60) or National Emission Standards for Hazardous Air Pollutants (326 IAC 14, 40 CFR 63) applicable to any of the facilities.

State Rule Applicability - Entire Source

- (1) 326 IAC 2-6 (Emission Reporting)
 This source is subject to 326 IAC 2-6 (Emission Reporting), because it emits more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).
- (2) 326 IAC 4 (Open Burning)
 This rule requires that the permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The source is currently in compliance with this rule.

- (2) 326 IAC 4-2 (Incineration) and 326 IAC 9-1-2(3)
This rule requires that the permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2(3). The source is currently in compliance with this rule.
- (3) 326 IAC 5-1-2 (Visible Emission Limitations)
This rule requires the visible emissions from the entire source to meet the following:
- (a) Visible emissions shall not exceed an average of 30% opacity in 24 consecutive readings;
- (b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.
- (4) 326 IAC 6-4 (Fugitive Dust Emissions)
This rule requires the source not to generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

State Rule Applicability - Individual Facilities

- (1) 326 IAC 6-3-2 (Particulate emission limitations from process operations)
This rule requires that particulate matter (PM) emissions from the bag dumping, extrusion, and molding/pressing operations to not exceed the following limits:

Process Operation	Allowable Limit (lb/hr)
CaCO ₃ bag dumping (EU-01a)	4.0
Crystic bag dumping (EU-01b)	1.1
extrusion (EU-02)	7.1
molding/pressing (EU-03)	0.7

- (2) 326 IAC 8-1-6 (BACT analysis requirement for VOC reduction)
This rule requires that new facilities (as of January 1, 1980), which have potential emissions of 25 tons or more per year, located anywhere in the state, which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using best available control technology (BACT).

The extrusion operation (EU-02) is subject to this rule since it's VOC potential emissions is greater than 25 tons per year (75.4 tons per year). But National Composites, Inc. has accepted to limit the VOC material usage of this facility such that the VOC emissions will not exceed 22 tons per 12 consecutive month period rolled on a monthly basis. Therefore, 326 IAC 8-1-6 does not apply.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state

and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (1) The two (2) bag dumping stations (ID#s EU-01a and EU-01b) have applicable compliance monitoring conditions as specified below:

Preventive Maintenance Plan [326 IAC 2-8-4(9)]

That a Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the CaCO₃ bag dumping station.

- (2) The extrusion operation (ID# EU-02) and molding/pressing operation (ID# EU-03) have applicable compliance monitoring conditions as specified below:

Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the extrusion and molding/pressing operations.

The compliance determination requirements applicable to this source are as follows:

- (1) The extrusion operation (ID# EU-02) and molding/pressing operation (ID# EU-03) have applicable compliance determination conditions as specified below:

(a) Volatile Organic Compound (VOC)

That the Permittee shall maintain at the source complete and sufficient records to establish compliance with the VOC limit. The records shall contain a minimum of the following:

- (1) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- (2) The density (pounds per gallon) of the VOC containing material;
- (3) The VOC content (weight percent) of each material used;
- (4) The number of units manufactured by the extrusion operation per month; and

- (5) The weight of VOCs emitted for each compliance period.
- (b) Hazardous Air Pollutant (HAP)
That the Permittee shall maintain at the source complete and sufficient records to establish compliance with the HAP limits. The records shall contain a minimum of the following:
 - (1) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
 - (2) The density (pounds per gallon) of the HAP containing material;
 - (3) The HAP content (weight percent) of each material used;
 - (4) The number of units manufactured by the extrusion and molding/pressing operations per month; and
 - (5) The weight of HAPs emitted for each compliance period.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

This source has accepted federally enforceable air toxic emission limits of 8.8 tons per year for any single HAP and 22 tons per year for any combination of HAPs.

Conclusion

The operation of this reinforced plastic products manufacturing plant will be subject to the conditions of the attached proposed **FESOP No. F141-5531-00085**.

Table (1)

Stack/Vent ID:	general ventilation (GV)			
Stack/Vent Dimensions:	Ht: n/a	Dia: n/a	Temp: n/a	Flow: n/a
Emission Unit:	(a) two (2) extruders and (b) four (4) mold presses			
Date of Construction:	(a) Nov. 1991 and (b) Jan. 1990			
Alternative Scenario:	none			
Pollution Control Equipment:	none			
General Description of Requirement:	VOC usage/emission limitation for extrusion operation only	HAP usage/emission limitation for extrusion and molding/pressing operations		
Numerical Emission Limit:	24.0 tons per 12 consecutive month period rolled on a monthly basis	single HAP = 7.7 tons per 12 consecutive month period rolled on a monthly basis total HAPs = 20.2 tons per 12 consecutive month period rolled on a monthly basis		
Regulation/Citation:	326 IAC 8-1-6	326 IAC 2-8-4		
Compliance Demonstration:	record keeping of VOC material usage and emissions	record keeping of HAP material usage and emissions		
PERFORMANCE TESTING	n/a	n/a		
COMPLIANCE MONITORING				
Monitoring Description:	none	none		
Monitoring Frequency:				
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	The weight of VOC containing material used; The density of VOC containing material; The VOC content (weight percent) of each material used; The number of units manufactured by extrusion operation per month; and The weight of VOCs emitted	The weight of HAP containing material used; The density of HAP containing material; The HAP content (weight percent) of each material used; The number of units manufactured by extrusion and molding/pressing operations per month; and The weight of HAPs emitted		
Recording Frequency:	monthly	monthly		
REPORTING REQUIREMENTS				
Information in Report:	VOC emissions	single and total HAP emissions		
Reporting Frequency/Submittal:	semi-annual	semi-annual		
Additional Comments:	none	none		

Company Name: National Composites, Inc.
Address City IN Zip: 2629 Foundation Drive, South Bend, IN 46628
FESOP No.: F 141-5531
Plt ID: 141-00085
Reviewer: Marco A. Salenda
Date: July 25, 1996

I. POTENTIAL (VOC and PM/PM-10)

Material	Density (lb/gal)	Weight % VOC	Gallons per unit	Units per hour	Pounds VOC per hour	Pounds VOC per day	Tons of VOC per year	Tons PM/PM-10 per year	Emission Factor (Flash off)	Transfer Efficiency
A. PRODUCTION OF LPMC VIA EXTRUSION (EU-02)										
<i>LIQUID POLYESTER RESIN:</i>				(1 unit = 4,500 lbs)						
CX-2151 POLYESTER RESIN	8.82	37.0%	27.10	1.00	1.77	42.45	7.75	0.00	2%	100%
UNSATURATED POLYESTER RESIN	10.24	30.0%	27.10	1.00	1.67	39.96	7.29	0.00	2%	100%
31-513-00 POLYLITE	9.96	46.0%	27.10	1.00	2.48	59.60	10.88	0.00	2%	100%
COR42-DZ-6436 UNSATURATED POLYESTER RESIN *	14.16	50.0%	27.10	1.00	3.84	92.10	16.81	0.00	2%	100%
<i>THERMOPLASTIC SOLUTION:</i>										
S-602 POLYESTER RESIN	10.09	68.0%	44.58	1.00	6.12	146.83	26.80	0.00	2%	100%
LP-40A-R LOW PROFILE ADDITIVE	9.64	66.0%	44.58	1.00	9.88	237.23	43.30	0.00	2%	100%
LPA-1 POLYESTER LOW PROFILE ADDITIVE *	12.24	65.0%	44.58	1.00	7.09	170.25	31.07	0.00	2%	100%
<i>STYRENE MONOMER:</i>										
UN2055 STYRENE MONOMER *	7.5	100.0%	18.00	1.00	2.70	64.80	11.83	0.00	2%	100%
Total for worst case scenario for A:					13.63	327.15	71.93	0.00		
B. MOLDING/PRESSING OF LPMC (EU-03)										
				(0.033 unit = 150 lbs)						
LOW PRESSURE MOLDING COMPOUND (LPMC) *	14.99	18.0%	293.54	0.03	0.78	18.82	3.43	0.00	3%	100%
Total for worst case scenario for B:					0.78	18.82	3.43	0.00		
Total for worst case scenario (A + B):					14.42	345.97	75.36	0.00		

METHODOLOGY

* Worst case

Potential VOC Pounds per Hour = Density (lb/gal) * Weight % VOC * Gal of Material (gal/unit) * Maximum (unit/hr) * Emission factor

Potential VOC Pounds per Day = Density (lb/gal) * Weight % VOC * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * Emission factor

Potential VOC Tons per Year = Density (lb/gal) * Weight % VOC * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * Emission factor

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)

Total = Worst Coating + Sum of all solvents used

Emissions factor for extrusion of resin is 2%.

Emission factor for closed molding of resin NVS is 3%.

Emission Factors are from AP42, Fifth Edition (January 1995), Table 4.4-2

NVS = Non-vapor suppressed resin

Since acetone has been delisted from the list of VOCs, its emissions are not calculated.

II. APPLICABLE REQUIREMENTS

A. Pursuant to 326 IAC 8-1-6, new facilities (as of January 1, 1996), which have potential emissions of 25 tons per year, located anywhere in the state, which are not otherwise regulated but other provisions of article (326 IAC 8), shall reduce VOC emissions using best available control technology (BACT).

B. The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

1. Extrusion

$$P = 2.25 \text{ tons/hr}$$

$$\text{limit} = 4.1 \times (2.25^{0.67}) = 7.1 \text{ lb/hr} \quad (\text{allowable})$$

$$30.9 \text{ tons/yr}$$

$$0.0 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 0.0 \text{ lb/hr} \quad (\text{will comply})$$

2. Molding/Pressing

$$P = 0.075 \text{ tons/hr}$$

$$\text{limit} = 4.1 \times (0.075^{0.67}) = 0.7 \text{ lb/hr} \quad (\text{allowable})$$

$$3.2 \text{ tons/yr}$$

$$0.0 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 0.0 \text{ lb/hr} \quad (\text{will comply})$$

III. LIMITED POTENTIAL

The VOC emissions from the extrusion operation (EU-02) is limited such that the single HAP limit is not exceeded (see page 3).

Indiana Department of Environmental Management Office of Air Management

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

National Composites, Inc.
2629 Foundation Drive, South Bend, IN 46628

F-141-5531, Plt ID-141-00085

On November 12, 1997, the Office of Air Management (OAM) had a notice published in The South Bend Tribune, South Bend, Indiana, stating that National Composites, Inc. ("NCI") had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a reinforced plastic products manufacturing plant with control. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the IDEM has decided to make the following changes to the Technical Support Document (TSD):

- (1) The material usage limits that were established to limit the potential to emit volatile organic compounds (VOC) and hazardous air pollutants (HAPs) have been changed from the proposed permit. The proposed permit included a nine percent (9%) lower value. The purpose of this was to simplify the record keeping and reporting requirements necessary to demonstrate that the potential to emit was below the major source thresholds. The new limit in the final permit eliminates the reduction but still satisfies the underlying requirement that the source's potential to emit is below all major source thresholds.

(2) ***Limited Potential To Emit Section***

The source has accepted the following federally enforceable limitations:

- (a) ~~To simplify record keeping and to accommodate unpredictable variations in production, the source has accepted federally enforceable production limitations that limit potential to emit VOC emissions from the extrusion operation to 22.0 tons per 12 consecutive month period rolled on a monthly basis. Since the only VOC used and emitted by the extrusion operation is styrene, which is also a HAP, the VOC usage is limited to what is allowed as the single HAP usage. This would render 326 IAC 8-1-6 (VOC Reduction Requirement for New Facilities) not applicable. This limit was established at 11/12ths of 24 tons per year to eliminate the effect that daily variations would have on any 365 day period. Therefore, 326 IAC 8-1-6 does not apply.~~
- (b) The source has accepted a limit on **HAP usage such that the potential to emit a single HAP does not exceed of 7.2 a total of 7.8 tons per 12 consecutive month period** from both the extrusion and molding/pressing operations ~~for any single HAP and 19 tons per 12 consecutive month period for any combination of HAPs for significant activities only (i.e., extrusion and molding/pressing operations). These~~ This limit ~~was~~ was established at ~~11/12ths of 9.4 tons per year excluding insignificant activities (1.6 tons per year) for any single HAP and 11/12ths of 24 tons per year excluding insignificant activities (3.0 tons per year) for any combination of HAPs. These~~ eliminate the effect that daily variations would have on any 365 day period.

Any change or modification which may result in potential emissions of any

combination of HAPs greater than 24 tons per year from these facilities shall need prior approval from IDEM, OAM, and shall be subject to 326 IAC 2-7 (Part 70 Rules).

- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/ facility	Limited PTE (tons/yr)		
	VOC	Single HAP	Total HAPs
bag dumping (EU-01)	0.0	0.0	0.0
extrusion (EU-02)	22 7.8	7.2 7.8	49 7.8
molding/pressing (EU-03)	3.4		
insignificant activities	3.2 1.6	1.6	3.0
Total Emissions	29 9.4	9.4	11.8

Attached Table (1) summarizes the permit conditions and requirements.

(3) **State Rule Applicability - Individual Facilities Section**

- (a) 326 IAC 6-3-2 (Particulate emission limitations from process operations)
 This rule requires that particulate matter (PM) emissions from the bag dumping, extrusion, and molding/pressing operations to not exceed the following limits:

Process Operation	Allowable Limit (lb/hr)
CaCO ₃ bag dumping (EU-01a)	4.0
Crystic bag dumping (EU-01b)	1.1
extrusion (EU-02)	7.1
molding/pressing (EU-03)	0.7

- (b) 326 IAC 8-1-6 (BACT analysis requirement for VOC reduction)
 This rule requires that new facilities (as of January 1, 1980), which have potential emissions of 25 tons or more per year, located anywhere in the state, which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using best available control technology (BACT).

The extrusion operation (EU-02) is subject to this rule since it's VOC potential emissions is greater than 25 tons per year (75.4 tons per year). But National Composites, Inc. has accepted to limit the VOC material usage of this facility as described under the **Limited Potential To Emit** section ~~such that the VOC emissions will not exceed 22 tons per 12 consecutive month period rolled on a monthly basis.~~ Therefore, 326 IAC 8-1-6 does not apply.

(4) **Compliance Requirements Section**

* * *

The compliance determination requirements applicable to this source are as follows:

The extrusion operation (ID# EU-02) and molding/pressing operation (ID# EU-03) have applicable compliance determination conditions as specified below:

- (a) ~~Volatile Organic Compound (VOC)~~
That the Permittee shall maintain at the source complete and sufficient records to establish compliance with the VOC limit. The records shall contain a minimum of the following:
 - (1) ~~The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;~~
 - (2) ~~The density (pounds per gallon) of the VOC containing material;~~
 - (3) ~~The VOC content (weight percent) of each material used;~~
 - (4) ~~The number of units manufactured by the extrusion operation per month; and~~
 - (5) ~~The weight of VOCs emitted for each compliance period.~~
- (b) Hazardous Air Pollutant (HAP)
That the Permittee shall maintain at the source complete and sufficient records to establish compliance with the HAP limits. The records shall contain a minimum of the following:
 - (a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
 - (b) The density (pounds per gallon) of the HAP containing material;
 - (c) The HAP content (weight percent) of each material used; **and**
 - (d) ~~The number of units manufactured by the extrusion and molding/pressing operations per month; and~~
 - (e)(d)** The weight of HAPs emitted for each compliance period.

- (5) The compliance table at the end of the TSD has been revised and the final table appears as follows:

Table (1)

Stack/Vent ID:	general ventilation (GV)			
Stack/Vent Dimensions:	Ht: n/a	Dia: n/a	Temp: n/a	Flow: n/a
Emission Unit:	(a) two (2) extruders and (b) four (4) mold presses			
Date of Construction:	(a) Nov. 1991 and (b) Jan. 1990			
Alternative Scenario:	none			
Pollution Control Equipment:	none			
General Description of Requirement:	HAP usage limitation for extrusion and molding/pressing operations			
Numerical Emission Limit:	single HAP emissions = 7.8 tons per 12 consecutive month period rolled on a monthly basis			
Regulation/Citation:	326 IAC 2-8-4			
Compliance Demonstration:	record keeping of HAP material usage and emissions			
PERFORMANCE TESTING n/a				
COMPLIANCE MONITORING				
Monitoring Description:	none			
Monitoring Frequency:				
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	The weight of HAP containing material used; The density of HAP containing material; The HAP content (weight percent) of each material used; and The weight of HAP emitted			
Recording Frequency:	monthly			
REPORTING REQUIREMENTS				
Information in Report:	single and total HAP emissions			
Reporting Frequency/Submittal:	quarterly			
Additional Comments:	none			

The OAM has also decided to make the following changes to the FESOP:

Cover Page

- (1) The second paragraph has been revised as follows:

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Section A: Source Summary

- (2) In reference to subsection A.1 (General Information), the following changes has been made:
(a) The County Status has been revised as follows:

Attainment for PM-10, SO₂, and CO
~~Maintenance nonattainment~~ **Attainment** for Ozone
~~Secondary nonattainment for TSP (pending U.S. EPA approval of redesignation to attainment on June 16, 1997)~~ **(East of Pine Road and North of Kern Road)**

- (b) The Source Status has been revised as follows:

~~Synthetic Minor Source, FESOP Program~~
Federally Enforceable State Operating Permit
Minor Source, under PSD and Emission Offset Rules

- (3) In reference to subsection A.2 (Emission Units and Pollution Control Equipment), item (a), The description of the Crystic bag dumping station (ID# EU-01b) has been revised as follows:

one (1) Crystic bag dumping station (ID# EU-01b) with a maximum dumping capacity of 0.1 ton per hour. Station EU-01b is attached to dust collector D2 and exhausts through stack D2. ~~Dust collector D2 does not have to be operated at all times, but only at the source's discretion.~~

Dust collector D2 has to be operated at all times in order to comply with the opacity requirements in operation condition C.2.

- (4) In reference to subsection A.3 (Insignificant Activities), the rule cite in the first sentence has been changed from 326 IAC 2-7-1(20) to 326 IAC 2-7-1(21).

Section B: General Conditions

- (5) Condition B.1 has been revised as follows:

~~B.1 General Requirements [IC 13-15] [IC 13-17] (Prior to July 1, 1996: IC 13-7 and IC 13-1-4)~~

~~The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.~~

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or

possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

- (6) Condition B.2 (Definitions) has been revised as follows:

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11 ~~(prior to July 1, 1996, IC 13-7-1, IC 13-1-1-2)~~, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

- (7) Condition B.6 (Severability) has been revised as follows:

B.6 Severability [326 IAC 2-8-4(4)] ~~[326 IAC 2-8-7(a)(3)]~~

~~(a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.~~

~~(b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.~~

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

- (8) Condition B.8 (Duty to Supplement and Provide Information), item (c), has been revised as follows:

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, and Saint Joseph County Health Department copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA, ~~and~~ IDEM, OAM, and Saint Joseph County Health Department along with a claim of confidentiality under 40 CFR 2, Subpart B.

~~Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM, and Saint Joseph County Health Department).~~

- (9) Condition B.11 (Certification), items (b) and (c) have been revised as follows:

(b) ~~This certification shall be submitted on the attached Certification Form.~~
One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1~~(33)~~ **(34)**.

- (10) Condition B.12 (Annual Compliance Certification), items (a) and (b), has been revised as follows:

(a) The Permittee shall annually ~~certify that this source has complied~~ **submit a compliance certification report which addresses the status of the source's compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification **shall cover the time period from January 1 to December 31 of the previous year, and** shall be submitted in letter form no later than

~~July 1~~ **April 15** of each year to:

* * *

- (b) ~~This~~ **The** annual compliance certification report required by this permit shall be **considered** timely if ~~delivered by any method and received and stamped by IDEM, OAM, and Saint Joseph County Health Department on or before the date it is due. [326 IAC 2-5-3]~~ **the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Saint Joseph County Health Department on or before the date it is due. [326 IAC 2-5-3]**

The following paragraph has been added at the end of item (c):

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Item (d) has been deleted.

- (11) Condition B.13 (Preventive Maintenance Plan), item (a) has been revised as follows:

- (a) **If required by specific condition(s) in Section D of this permit, the** ~~The~~ Permittee shall prepare, maintain and implement Preventive Maintenance Plans within ninety (90) days after the issuance of this permit, including the following information on each:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) ~~Corrective actions that will be implemented in the event an inspection indicates an out-of-specification situation;~~
Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
 - (4) ~~A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and~~
 - (5) ~~Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.~~

A new item (b) as been added:

- (b) **The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.**

Succeeding item has been relettered accordingly.

- (12) Condition B.15 (Deviations from Permit Requirements and Conditions), items (a) and (b), have been revised as follows:

- (a) Deviations from any permit . . . and any ~~corrective actions~~ **response steps** or . . .
- (b) Written notification shall be submitted on the attached **Emergency/**Deviation Occurrence Reporting Form or its substantial equivalent.

Item (c) has also been added:

- (c) **Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.**

- (13) Condition B.16 (Permit Modification, Reopening, Revocation and Reissuance, or Termination), item (b) has been revised as follows:

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 ~~(prior to July 1, 1996, in IC 13-7-10-5)~~ or if IDEM, OAM, and Saint Joseph County Health Department determines any of the following:

* * *

- (14) In reference to Condition B.17 (Permit Renewal), item (a), the rule cite at the end of the first paragraph has been changed from 326 IAC 2-7-1(20) to 326 IAC 2-7-1(21). Item (b), subitem (1) has been revised as follows:

- (1) ~~The Permittee has a duty to submit a timely and complete permit renewal application. A~~ timely renewal application is one that is:

- (15) Condition B.19 (Minor Permit Modification), items (b) and (d), have been revised as follows:

- (b) Minor ~~permit~~ modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F), **except as provided by 326 IAC 2-8-11(c).**
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application ~~unless provided~~ **the change is subject to the construction permit requirements of has received any approval required by 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3.** After the Permittee makes . . .

- (16) Condition B.23 (Operational Flexibility), items (b) and (d), has been revised as follows:

- (b) For each such **Section 502(b)(10) of the Clean Air Act** change, the required written notification shall include the following:
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7) ~~and subject to the constraints in Section (a) of this condition and those in 326 IAC 2-8-15(d).~~ **No prior notification of IDEM, OAM or U.S. EPA is required.**

- (17) Condition B.24 (Construction Permit Requirement) has been revised as follows:

~~Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2-~~
Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

- (18) Condition B.26 (Transfer of Ownership or Operation), item (b), has been revised as follows:
- (b) The written notification shall be sufficient to transfer the permit to the new owner **by an administrative amendment pursuant to 326 IAC 2-8-10.**
- (19) Condition B.27 (Annual Fee Payment), items (a) and (b), have been revised as follows:
- (a) The Permittee shall pay annual fees to IDEM, OAM, **within thirty (30) calendar days of receipt of a billing, or in a time period** consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action; **or** revocation of this permit ~~referral to the Office of Attorney General for collection, or other appropriate measures.~~

Item (c) of the proposed permit has been deleted and succeeding item has been relettered accordingly.

Section C: Source Operation Conditions

- (20) Condition C.1 (Overall Source Limit), item (a), subitem (1), has been revised as follows:
- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also ~~satisfy~~ **make** the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) and 326 IAC 2-3 (Emission Offset) **not applicable;**
- The rule cite in item (b) has been changed from 326 IAC 2-7-1(20) to 326 IAC 2-7-1(21).
- (21) Condition C.3 (Open Burning) has been revised as follows:
- The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2(3). **The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.**
- (22) Condition C.5 (Fugitive Dust Emissions) has been revised as follows:
- The Permittee shall ~~be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)]~~ **not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.**
- (23) Condition C.6 (Operation Equipment) has been revised as follows:
- (a) ~~All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B- Preventive Maintenance Plan.~~

- ~~(b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation.~~
- ~~(c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.~~

All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

- (24) [40 CFR 61, Subpart M] has been added as a rule cite for condition C.7 (Asbestos Abatement Projects Accreditation)

- (25) Condition C.8 (Performance Testing), item (a), has been revised as follows:

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), **except as provided elsewhere in this permit**, utilizing methods approved by the IDEM, OAM.

* * *

~~No~~ **no** later than thirty-five (35) days before the intended test date.

Item (b) has been added:

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.**

- (26) The first sentence of condition C.9 (Compliance Monitoring) has been revised as follows:

Compliance with applicable requirements shall be documented ~~in accordance with the provisions of 326 IAC 2-8-4(3)~~ **as required by this permit..**

- (27) Condition C.11 (Asbestos Abatement Projects), items (c) and (f), have been revised as follows:

- (c) The Permittee shall **ensure that the notice is** postmarked or delivered ~~the notice~~ according to the guidelines set forth in 326 IAC 14-10-3(2).

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires **the owner or operator**, prior to a renovation/demolition, ~~the owner or operator must to~~ use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. **The requirement that the inspector be accredited is federally enforceable.**

- (28) Condition C.12 (Risk Management Plan), items (a) and (b), have been combined as follows:

If a regulated substance, **subject to 40 CFR 68**, is present in more than a threshold quantity,

~~that is subject to 40 CFR 68 is an applicable requirement and the Permittee shall:~~

(a) ~~40 CFR 68 is an applicable requirement; Submit:~~

(b) ~~The Permittee shall submit:~~

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (2) As part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (3) A verification to IDEM, OAM, and Saint Joseph County Health Department that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

The succeeding item has been relettered accordingly.

(29) Condition C.13 (Compliance Monitoring Plan - Failure to Take Corrective Action), item (a), subitem (5) has been revised as follows:

(5) ~~The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.~~

A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and Saint Joseph County Health Department upon request and shall be subject to review and approval by IDEM, OAM, and Saint Joseph County Health Department. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

- (A) **Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and**
- (B) **A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.**

Item (b), (c), and (d) have also been revised as follows:

(b) ~~For each compliance monitoring condition of this permit appropriate corrective actions~~ **response steps, as described in the Preventive Maintenance Plan,** shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the ~~corrective actions response steps~~ **response steps** within the ~~time prescribed time in the contained~~ **time** within the ~~Preventive Maintenance Plan~~ **Compliance Response Plan** shall constitute a violation of the permit unless taking the ~~corrective action response steps~~ **response steps** set forth in the ~~Preventive Maintenance Plan~~ **Compliance Response Plan** would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee ~~may be~~ **is** excused from taking further ~~corrective action response steps~~ **response steps** for any of the following reasons:

* * *

- (2) The Permittee has determined that the **compliance monitoring** parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or

* * *

- (d) Records shall be kept of all instances in which the ~~action values were~~ **compliance related information was** not met and of all ~~corrective actions~~ response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (30) Condition C.14 (Actions Related to Noncompliance Demonstrated by a Stack Test), items (a) and (b), have been revised as follows:
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit, exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions ~~shall be taken~~. **The Permittee shall submit a** description of these corrective actions ~~shall be submitted~~ to IDEM, OAM, and Saint Joseph County Health Department within thirty (30) days of receipt of the test results. ~~These corrective actions shall be implemented immediately unless notified by IDEM, OAM, and Saint Joseph County Health Department that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented.~~ The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM, and Saint Joseph County Health Department reserve the right to utilize enforcement activities to resolve the non-compliant stack test(s).
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. **Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.** Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.
- (31) In reference to condition C.15 (Emission Statement), item (a), the annual emission statement must be submitted to:

Indiana Department of Environmental Management
~~Data Support~~ **Technical Support and Modeling** Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

* * *

Item (b) has also been revised as follows:

- (b) ~~This~~ **The** annual emission statement required by this permit shall be **considered** timely if ~~delivered by any method and received and stamped the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private~~

shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Saint Joseph County Health Department on or before the date it is due. [326 IAC 2-5-3]

(32) Condition C.16 (Monitoring Data Availability), items (a) and (b), have been revised as follows:

- (a) ~~All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.~~
With the exception of performance tests conducted in accordance with Section C- Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) ~~When the equipment listed in Section D is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~
As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(33) Condition C.17 (General Record Keeping Requirements), item (c), subitem (4), has been revised as follows:

- (c) Support information shall include, where applicable:

* * *

- (4) ~~Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.~~
Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(34) In reference to condition C.18 (General Reporting Requirements), a new item (a) has been added:

- (a) **To affirm that the source has met all the requirements stated in this permit the**

source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

Item (a) of the proposed permit, relettered as (b), has been revised as follows:

~~(a) (b)~~ Unless otherwise specified in this permit, **The report required in (a) of this condition** and reports required by conditions in Section D of this permit shall be submitted to:

* * *

Item (b) of the proposed permit, relettered as (c), has been revised as follows:

~~(b) (c)~~ Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be **considered** timely if ~~delivered by any method and received and stamped the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if~~ **received** by IDEM, OAM, and Saint Joseph County Health Department on or before the date it is due. [326 IAC 2-5-3]

Item (c) of the proposed permit, relettered as (d), has been revised as follows:

~~(c) (d)~~ Unless otherwise specified in this permit any ~~semi-annual~~ **quarterly** report shall be submitted within thirty (30) days of the end of the ~~six (6) month~~ reporting period.

Item (d) of the proposed permit, relettered as (e), has been revised as follows:

~~(d) (e)~~ All instances of deviations ~~from any requirements of this permit~~ must be clearly identified in such reports. **A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

Item (e) of the proposed permit, relettered as (f), has been revised as follows:

~~(e) (f)~~ Any corrective actions **or response steps** taken as a result of ~~an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions~~ **each deviation** must be clearly identified in such reports.

Item (f) of the proposed permit, relettered as (g), has been revised as follows:

- (f) (g) The first report shall cover the period commencing the date of issuance of this permit and ending ~~December 31, 1997. The first semi-annual report shall cover the period from January 1, 1998 up to June 30, 1998.~~ **on the last day of the reporting period.**

Section D.1: Facility Operation Conditions for CaCO₃ and Crystic Bag Dumping Stations

- (35) The description of the Crystic bag dumping station (ID# EU-01b) has been revised as follows:

one (1) Crystic bag dumping station (ID# EU-01b) with a maximum dumping capacity of 0.1 ton per hour. Station EU-01b is attached to dust collector D2 and exhausts through stack D2. ~~Dust collector D2 does not have to be operated at all times, but only at the source's discretion.~~

Dust collector D2 has to be operated at all times in order to comply with the opacity requirements in operation condition C.2.

- (36) Condition D.1.2 (Testing Requirements) has been revised as follows:

Testing of the CaCO₃ and Crystic bag dumping stations is not required by this permit. However, **if testing is required, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.** ~~this~~ This does not preclude testing requirements on these facilities under ~~326 IAC 2-1-4(f) and 326 IAC 2-8-4~~ and **326 IAC 2-8-5.**

Section D2: Facility Operation Conditions for Extrusion and Mold/Pressing Operations

- (37) The following volatile organic compounds (VOC) condition (D.2.2 of the proposed permit), which intends to make 326 IAC 8-1-6 (VOC Reduction Requirement for New Facilities) not applicable has been deleted:

~~D.2.2 Volatile Organic Compounds (VOC)~~

~~That the VOC material usage for the extrusion operation shall be limited such that the VOC emissions from this facility will not exceed 22 tons per 12 consecutive month period rolled on a monthly basis. Therefore, 326 IAC 8-1-6 does not apply. The VOC emissions shall be determined using the following equation:~~

$$\begin{aligned} \text{VOC emissions (tons/month)} = \\ \{ \text{Summation [density of each material (lb/gal) * wt. \% of VOC in each} \\ \text{material * gallons used of each material per unit (gal/unit) * (actual} \\ \text{number of units/mos)} \} * 1 \text{ ton/2,000 lbs.} \end{aligned}$$

This condition has been deleted for the following reasons:

- (a) The only VOC used and emitted by both the extrusion operation (ID# EU-02) and molding/pressing operation (ID# EU-03) is styrene, which is also a hazardous air pollutant (HAP). Since the single HAP usage is limited such that the total single HAP emissions from these two (2) facilities does not exceed 7.8 tons per 12 consecutive month period rolled on a monthly basis, compliance with this limit shall render 326 IAC 2-7 (Part 70 Rules) and 326 IAC 8-1-6 (VOC Reduction Requirement for New Facilities) not applicable.
- (b) This would eliminate any confusions on to how much styrene is limited. Furthermore, NCI does not foresee any other type of VOC or HAP being

introduced or emitted from these facilities during the lifetime of the permit.

As a result of this deletion, operation conditions D.2.6 (Record Keeping Requirements) and D.2.7 (Reporting Requirements) of the proposed permit have been revised and renumbered accordingly. These conditions appear in the final permit as follows:

D.2.5 Record Keeping Requirements

That the Permittee shall maintain at the source complete and sufficient records to establish compliance with the HAP limit established in condition D.2.2. The records shall contain a minimum of the following:

- (a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- (b) The density (pounds per gallon) of the HAP containing material;
- (c) The HAP content (weight percent) of each material used; and
- (d) The weight of HAP emitted for each compliance period.

D.2.6 Quarterly Reporting Requirements

That a quarterly summary to document compliance with operation conditions D.2.2 shall be submitted, using the enclosed forms or their equivalent, within thirty (30) days after the end of the reporting period.

- (38) Operation condition D.2.3, which limits the total HAP(s) usage of EU-02 and EU-03, of the proposed permit has been revised as follows:

~~D.2.3 Hazardous Air Pollutants (HAPs)~~

~~That the HAP material usage for the extrusion and molding/pressing operations shall be limited such that:~~

- ~~(a) Total single HAP emissions from these facilities will not exceed 7.2 tons per 12 consecutive month period rolled on a monthly basis.~~
- ~~(b) Total of any combination of HAPs emissions from these facilities will not exceed 19 tons per 12 consecutive month period.~~

~~Therefore, the requirements of 326 IAC 2-7 (Part 70 Rules) do not apply. The HAP emissions shall be determined using the following equation:~~

$$\begin{aligned} \text{Total single HAP emissions (tons/month)} = & \\ & \{ \text{Summation [density of each material (lb/gal) * wt. \% of single HAP in} \\ & \text{each material * gallons used of each material per unit (gal/unit) * (actual} \\ & \text{number of units/mos) * emission factor, Ef]} \} * 1 \text{ ton/2,000 lbs.} \end{aligned}$$

$$\text{Ef for extrusion} = 0.02$$

$$\text{Ef for molding/pressing} = 0.03$$

D.2.2 Hazardous Air Pollutants (HAPs)

- (a) That the HAP material usage for the extrusion and molding/pressing operations shall be limited such that the total single HAP emissions from these facilities shall not exceed 7.8 tons per 12 consecutive month period rolled on a monthly basis. The monthly HAP emissions shall be determined using the following equation:

Single HAP emissions (tons/month) = single HAP usage for extrusion (tons/month) * 0.02 + single HAP usage for molding/pressing (tons/month)* 0.03

Therefore, the requirements of 326 IAC 2-7 (Part 70 Rules) do not apply. Since single HAP emissions are equivalent to VOC emissions for these types of operations, compliance with the HAP limits shall also render 326 IAC 8-1-6 not applicable.

- (b) Any change or modification which may result in potential emissions of any combination of HAPs greater than 24 tons per year from these facilities shall need prior approval from IDEM, OAM, and shall be subject to 326 IAC 2-7 (Part 70 Rules).**

The revision has been made due to the same reasons mentioned in item (2) of this TSD Addendum.

- (39) Condition D.2. 4 (Testing Requirements) of the proposed permit, renumbered as D.2.3, has been revised as follows:

Testing of the extrusion and mold/pressing operations is not required by this permit. However, **if testing is required, compliance with the PM limit specified in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.** ~~this~~ **This** does not preclude testing requirements on these facilities under ~~326 IAC 2-1-4(f) and 326 IAC 2-8-4~~ **and 326 IAC 2-8-5.**